

# **EXHIBIT A**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ROBERT P. "SKIP" CUMMINS,

Plaintiff,

VS.

SUNTRUST CAPITAL MARKETS, INC.,  
AMIT HAZAN, and JONATHAN BLOCK,

## Defendants.

Case No. 07 CV 4633 (JGK)

## JURY DEMAND

**DEFENDANTS' PROPOSED SCHEDULING ORDER**

1. New Parties shall be joined by: October 31, 2007
  2. Merits Discovery shall be completed by: 270 days after the date of the filing of Defendants' Proposed Schedule
  3. Plaintiff shall file any amendment to pleadings without leave of Court by: 30 days after the close of Merits Discovery
  4. Defendants shall file any amendment to pleadings without leave of Court by: 60 days after the close of Merits Discovery
  5. Expert Witnesses for Plaintiff shall be designated and a report furnished by: 30 days after the close of Merits Discovery
  6. Expert Witnesses for Defendants shall be designated and a report furnished by: 60 days after the due date for Plaintiffs' designation of Expert Witnesses
  7. Rebuttal Experts for Plaintiff shall be designated and a report furnished by: 30 days after the due date for the designation of Defendants' Expert Witnesses
  8. Expert Discovery shall be completed by: 30 days after the due date for Plaintiffs' designation of Rebuttal Experts
  9. Dispositive motions must be filed by: 30 days after the completion of Expert Discovery

10. All other pretrial motions (including *Daubert* motions, but not including motions in limine) will be filed by: 45 days after dispositive motions are decided
11. Joint Pretrial Order shall be filed by: 45 days after dispositive motions are decided

SO ORDERED this \_\_\_\_ day of \_\_\_\_\_, 2007.

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HONORABLE JOHN G. KOELTL  
UNITED STATES DISTRICT JUDGE

Respectfully submitted  
this 27th day of July, 2007 by:

ALSTON & BIRD LLP

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